

Federal Defenders OF NEW YORK, INC.

Southern District
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Southern District of New York
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September 16, 2021

VIA ECF

Honorable Judge Laura Taylor Swain
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Selassie Sinclair
21 Cr. 52 (LTS)

Dear Judge Swain:

I write on behalf of my client Selassie Sinclair with consent from Assistant United States Attorney Sarah Kushner and United States Pretrial Officer Mohammed Ahmed, to respectfully request that the Court modify the conditions of the bond authorizing Mr. Sinclair to accompany his nine-year sister to and from the bus stop on the same block as his residence and to permit Mr. Sinclair to leave his residence to attend programming as directed by Pretrial Services.

On January 12, 2021, Your Honor imposed the following bail conditions: A \$50,000 personal recognizance bond to be cosigned by two financially responsible persons; travel restricted to the Southern and Eastern Districts of New York; home incarceration with GPS monitoring; Remote Mental Health Evaluation/Treatment as directed by pretrial services; avoid all contact with all codefendants including his brother, Judah Sinclair, and surrender of travel documents with no new applications.

Mr. Sinclair plans to be outside of the house Monday through Friday from 7:25am to 7:50am to drop off his sister at the school bus, and from 3pm to 3:35pm in order to wait for and accompany her back home. The bus stop is located on Junius Street between East New York Avenue and Liberty Avenue in Brooklyn. Additionally, Mr. Sinclair hopes to participate in educational, vocational, mental health, and/or any other programming that Pretrial Services deems appropriate.

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Thank you for your consideration of this request.

Respectfully submitted,

The foregoing requests are granted. DE
51 resolved. SO ORDERED.
9/16/2021
/s/ Laura Taylor Swain, Chief USDJ

/s/
Marisa K. Cabrera
Assistant Federal Defender
Tel.: (212) 417-8730

SO ORDERED:

**HONORABLE Laura Taylor Swain
United States District Judge**

**cc: Sarah L. Kushner, Esq., Assistant United States Attorney
Mohammed Ahmed, Pretrial Services Officer**